

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

MOSAIC POTASH CARLSBAD, INC.,

Plaintiff,

v.

Case Nos. 2:16-CV-00808-KG-SMV
2:17-CV-01268-KG-SMV

INTREPID POTASH, INC.;
INTREPID POTASH-NEW MEXICO, LLC;
STEVE GAMBLE,

Defendants.

NOTICE OF COMPLETION

Pursuant to Local Rule 7.4(e), Plaintiff Mosaic Potash Carlsbad, Inc.'s ("Mosaic") hereby notifies the Court that briefing on its Motion to Partially Exclude Intrepid Rule 26(a)(2)(B) Experts Barbara Arnold and David Hall, ECF No. 209, is complete and the motion is ready for decision.

Motion to Partially Exclude Intrepid Rule 26(a)(2)(B) Experts Barbara Arnold and David Hall, ECF No. 209, and supporting documents, ECF Nos. 210 and 210-1 to 210-22, 220, 222, 225 and 225-1 to 225-17, were filed May 15, 2019. Defendants Intrepid Potash, Inc. and Intrepid Potash-New Mexico, LLC, filed a response, ECF No. 234 on June 4, 2019. Mosaic filed its reply in support of its motion and supporting documents, ECF 263, 264 and 264-1 to 264-8 on June 19, 2019. Briefing is complete, and the motion is ready for decision.

Dated: June 21, 2019

DORSEY & WHITNEY LLP

/s/ Forrest Tahdooahnippah
Forrest Tahdooahnippah (*pro hac vice*)
forrest@dorsey.com
RJ Zayed (*pro hac vice*)
zayed.rj@dorsey.com
Shannon J. Bjorklund (*pro hac vice*)
bjorklund.shannon@dorsey.com
Alison Hill (*pro hac vice*)

hill.alison@dorsey.com
Suite 1500, 50 South Sixth Street
Minneapolis, MN 55402-1498
Telephone: (612) 340-2600
Facsimile: (612) 340-2868

KEMP SMITH LLP
Kathryn Brack Morrow
katy.morrow@kempsmith.com
3800 E. Lohman Ave., Suite C
Las Cruces, NM
Telephone: (575) 527-0023
Facsimile: (915) 546-5360

Attorneys for Plaintiff Mosaic Potash Carlsbad, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of June, 2019, I served the foregoing Notice of Completion via the Court's CM/ECF system, causing Defendants to be served electronically.

/s/ Forrest Tahdooahnippah

Forrest Tahdooahnippah (*pro hac vice*)